

## 1400 South 19th Avenue Bozeman, MT 59718-5496

Greetings,

Thank you for taking the time to attend the recent bison scoping meeting that was held in Bozeman. We estimate that approximately 150 individuals attended this meeting. Public scoping is an initial step in the development of a programmatic environmental impact statement that will examine the future of bison in Montana as wildlife. Attached you will find a compilation of all of the comments <u>as they were recorded</u> during the recent meeting in Bozeman. We have transcribed the comments that were submitted during the meeting exactly as they were recorded. There are a few instances where the handwriting was not clear and the comments reflect this. Please review the comments and let us know if there are additional comments you would like to submit. Fish, Wildlife, & Parks will be accepting public comments via regular mail, e-mail, or online through June 25th, 2012. The comments that were captured at each of the regional meetings and those submitted outside of the meetings will be available for review on the Fish, Wildlife & Parks website following the closure of the comment period.

We would like to thank you again for attending the recent meeting and hope that you will remain part of this process as Fish, Wildlife & Parks moves forward with the development of the programmatic environmental impact statement.

Sincerely,

Arnold Dood and Montana Fish, Wildlife, & Parks

### **To Submit Comments or Gain More Information**

FWP Website:	Written Comments:	E-mail Comments:
http://fwp.mt.gov/fishAndWildlife/	MT FWP Bison Plan Scoping	Bison_Management@
management/bison/future.html#scoping	ATTN: Arnold Dood	mt.gov
	1400 South 19th Ave	
	Bozeman, MT 59718	

# **Bozeman Public Scoping Meeting May 24th**, 2012

### **Issues and Concerns:**

- Management of wildlife and livestock are fundamentally different
- I am concerned about population, habitat, and risk management
- Wild bison herds need to be large; & on a large ecologically diverse habitat & allowed to fluctuate in
- Disease is the #1 problem with Bison program. We cannot keep Bison localized so the Bison will effect everyone/everything around them.
- Mismanagement of our native bison
- I am concerned about the costs associated with the Bison and if it will be run by the state or Federal
- How will Bison be controlled?
- Consider the historical role of buffalo on the landscape & what has Been lost & what can Be Benefited by Bringing them Back
- What will FWP do with bison if we have a drought?
- I am worried about how we will manage the bison during the different seasons and the associated issues such as fencing, food, interaction with livestock
- I would like to see the Bison wild, unfenced, and managed through hunting
- How are we planning on keeping the bison off private land
- Establish corridors that are large enough to allow movement to other populations
- Can't contain bison will affect everybody around them
- How will you contain bison on public land? Electric fences are inhumane.
- If bison leave ecological areas, who's responsible for getting bison back where they belong?
- Bison go where they want.
- How will bison be identified and tracked.
- Who will keep bison out of places they should not be
- Could topography be used as a main confinement tool to confine a herd naturally?
- Should not haze bison when pregnant or calving
- How is the free-ranging herd going to be managed by the state like to keep them out of other states & Canada – don't see us building a fence around the state
- Whose gonna manage them
- I am concerned about the ability to control the bison in regards to neighboring property
- Safety consideration, and private property
- Eventually there will be interaction with people! What are the approved methods of hazing?
- Liability for traffic accidents caused by bison
- Public safety issue certainly legitimate
  - West Yellowstone subdivisions buffalo pies
  - o People aren't worried about it
- Who will enforce safety issues
- How will public safety issues (i.e. roadways) Be dealt with
- How will public safety be addressed?
- Consider type of containment, & boundaries. Some type of boundary is needed to determine if an animal is "in" or "out."
- Will they be fenced in?
- Does anybody know what it takes to keep a bison in a fence?
- They won't be fence in right?
- Is containment going to be considered? If so, how secure? Relates to definition of "free range" people have different ideas about what that means.
- Cost of barrier fencing

- What does it take to keep a bison out?
- There's a big difference between elk & bison when it comes to their impacts on fences. Bison are more destructive.
- Define an adequate fence for private landowners to properly fence out bison & consider cost & compensation to landowner & tax paver.
- There is barrier fencing available for bison
- If bison are out on a large landscape how do you gather them for disease testing?
- Brucellosis can lay dormant for 8 years
- Disease regulations have changed DSA/testing
- One positive elk results in expansion of the DSA
- By law cattle must be brucellosis free
- A win for both sides would be for the state to lobby for a better vaccine for cattle.
- FWP should not focus on brucellosis
- No evidence of Brucellosis being transferred from a Bison to a cow. FWP is introducing disease free bison according to plan
- Livestock and bison population would be best served by creating a vaccine that was 100% effective against Brucells.
- 1 Case of disease will shut down beef industry in MT. No one will buy MT Beef. Bison are not worth that risk.
- What is reasonable distance that would prevent wildlife from transferring Brucellosis to livestock?
- Unvaccinated Bison will eventually contract disease and spread it Wolves rate migration
- Brucellosis is listed by CDC as Category 1 disease, which makes it difficult to create vaccine 100%
- Risk of reinfection of disease from Bison not worth risk of having a wild Bison population.
- Any proven evidence of brucellosis transmission from bison to cows?
- Get APHIS to develop a better vaccine adequate funding
- Translocation would use disease-free bison otherwise would be a failure
- Vaccination available/not 100% effective. Ability to control disease, livestock industry should push for 100%. Never can vaccinate every wildlife.
- Do relocation far enough away to have 0 risk of infecting a relocated bison herd.
- Look at data in elk movements and risk of YNP elk getting to various places in Montana
- Why would you want to have a disease carrying animal in MT?
- Brucellosis transmission not an exact science, hazing would to avoid afterbirth, fencing repairs. Need separation @ Horse Butte. Comprehensive plan needed w/ dispense requirements.
- They are not considered free ranging because they are managed, therefore not wildlife & there should be management plans & be able to monitor to ensure they are disease free, monitoring has to be long term they may start off uninfected but this needs to be monitored.
- Bison disease are a big threat & impact to livestock industry.
- Disease concern specifically brucellosis and how do we keep a disease free, free ranging bison herd healthy.
- My concern is disease carried by Buffalo. If Bison moved to different areas o MT. Once Bison move out of area they are placed the diseases will be widespread. If we don't manage the spread of disease Elk carry, we will not manage disease in bison.
- Cattle have got brucellosis from elk, possibly need separation from bison to prevent transmission
- How will they be sure wild Bison will not transfer Disease to cattle
- Fears of disease are unfounded, huge potential of free chase bison hunt, revenue could offset damages to private landowners
- How do we fund brucellosis free bison & elk
- Livestock & bison can carry brucella dormant for up to 8 yrs thus they need to be in quarantine that long prior to release
- Will FWP manage disease?

- Brucellosis is a disease that can affect the human population as well as elk, cattle and deer.
- Arnie is looking to bring in Bison from areas in addition to than YNP, which could decrease Disease
- Bringing in disease free bison will not matter because they will be infected any way by the elk population. Migration of wildlife populations will spread the disease statewide.
- Posters only disease free bison will be allowed to range. What will FWP do to keep those bison from contracting brucellosis from elk?
- How do they intend to deal with brucellosis if bison from Yellowstone.
- How do we deal with brucellosis transmission from elk to cattle?
- Need a better vaccine, however even if it was off the bioterrorist list the R&D/pharmc. Industry, there is no incentive as they won't make enough money
- Can we get a handle on brucellosis in YNP? Must be addressed
- When is the state –FWP, going to take a position brucellosis.?
- Reimburse for infected Animals
- FWP needs to consider the geographic Potential for Elk from the DSA to interact with this new herd!
- Whats the potential for the transmission between the new bison & any Elk in the area?
- How will livestock producers be protected from diseases (Brucellosis) from Bison?
- Disease testing of livestock is onerous and expensive
- The concept of creating a disease –free animal is fallacy
- Disease issues (brucellosis)
- Continuing animals together making disease issues worse
- Will bison/ brucellosis mgmt be reconciled w/ elk brucellosis mgmt
- Will bison be vaccinated
  - Will be proposed to vaccinate elk also?
  - Need research by vaccine producers
  - o This is a national/international issue
  - We don't want to be an economic pariah on this issue
- Is the issue brucellosis or grass
- Why aren't elk involved in the question when they also can carry brucellosis
- Brucellosis has not been controlled in the past by FWP and now they wish to move more possible
- Disease issue if this happens they will all be tested so disease won't be an issue (reintroduced
- Wild disease concerns be considered?
- YNP is the only known nucleus of brucellosis in the lower 48 at a 60% infection rate
- Concerned about disease side of things
  - o Why is it a good idea to endanger the food supply & the livestock industry
- What happens/how do we handle when or if Bison contract Brucellosis
- Would like animals managed w/ any type of vaccinations to go to livestock
  - o (NOT bison vaccinated but \$ to go to livestock) brucellosis is concern main concern
- To point of sending \$ to livestock industry
  - o Brucellosis vaccine is only about 70% effective at best
  - o Will never protect livestock with brucellosis vaccine
- Livestock owners spend \$1,000s /yr on vaccines
- Greatest concerns capture tests & slaughter to see if brucellosis is negative
- Talk of immunization of wildlife terrible idea
- Think DOL has done a disservice to their own industry b/c there has been Bruce. transmission & I think they failed their own numbers by not taking into account yrs ago the elk. They failed to properly manage livestock by not requesting/ demanding more effective vaccination for cattle. Also feel they haven't taken into account predation & other critters that consume the afterbirth that may possibly carry brucella abortis.

- Want to see rare alleles in Yellowstone bison conserved
- Genetics Bison General Wildness
- Genetic concerns will Canadian bison introductions
- We need to protect the wild bison genetics by increasing herds in MT
- Why is the YNP herd the only one that doesn't contain cattle genetics?
  - Poster Info
- Understanding the context of bison in MT the Relationship to other states & other North American Bison herds Like Canada & whether there value of genetics in avoiding bottle necks!
- If introduced need a viable population (genetic diversity)
- Genetic diversity needs to be considered or health of herd as well as range health
- No GMO alfalfa on pastureland in MT. Bison genetics will be affected by it.
- Need to do a lot more genetic testing of bison b/c if you get them from a lot of diff. sources you are most likely getting cattle genes in them
- 1000 Bison will loose more than 5% of their genetic diversity in 100 yrs AND random events will weaken natural selection that is necessary maintain wildness
- Is the YNP herd genetically pure? Reintroduction should be of genetically pure bison.
- I am concerned about keeping track of the genetical difference between wild bison in Yellowstone and other herds
- Make bison permits available to hunters
- Public hunting should be the primary conservation method
- Landowners allow hunting as management tool
- The bison we restore will be managed just like we manage big horn sheep, elk, deer including limited draw hunting
- Hunt the YNP bison herd.
- If hunting is used as mgmt tool what factor will determine ratio of American take vs. others
- How is the FWP going to manage the hunting?
- What assurances will hunters have at opportunities to hunt bison on reintroduction areas -- they paid for the management?
- Hunting should be like other species by FWP
- Be able to hunt Bison when outside YNP, open hunting, no permit drawing
- Will there be a hunting season on wild Bison like other species
- Clearly define the threshold where Bison be hunted on public land
- FWP struggles with private land access w/ elk and others, need to have good relationship w/ landowners to ensure access for bison hunting as a population mgmt tool
- Outfitter industry would benefit from additional hunting tags
- Soil maps should be considered. Best available science should be considered, a long with social considerations.
- If public lands are used for reintroduction do we include the whole US
- No problem w/ bison on public lands but don't think they'll stay there like elk don't stay
- Will FWP identify ecologically suitable habitat for bison and that implies vegetation, climate, assess, and land ownership
- What % of MT land is suitable for bison
- Most emphasis has been in CMR, there's concerns about grazing up there but there are groups buying up grazing rights, kicking owners out
- Hunting District 316 North of YNP
  - o I think it's not winter range (Slough Creek area)
- I would like more information on relocation sites and concerns about plans for habitat management and how we will keep them contained
- Look for large areas of public land
- Increase buffer zone around park

- Consider traditional Habitat & Range
- Return Bison only to areas they are wanted
- To avoid need to hazing, location or reintroduction sites would have to be carefully selected
- An emphasis on placing Bison on public or tribal land vs. private
- Where are they going to be released!
- Are there other places In Montana where Wild Bison can be? & How do we address the challenges/Because other areas have done it!
- Are there public lands in MT where wild Bison can go?
- Concerned about land designation where Bison herd will be, Bison should be placed at wilderness or equivalent lands
- Concerned about the numbers of free roaming bison and the lack of space available to them, more space needs to be available to allow them to roam
- Consider ecologically productive calving grounds.
- Cap bison #'s based on range conditions, local community, etc.
- Concerns about population dynamic
  - o How fast will they increase
  - o How will we manage #'s
- How will #s & individual animals be controlled
- We need to learn how to manage the populations we have before we expand Bison populations
- What is FWP going to do to manage the numbers in MT?
- Be prepared for public outcry if Bison have a massive die off. A plan specifically how to manage this. (The outcry)
- Number of bison to restore is a risky game, best not to specify?
- Landowner rights
- Don't want FWP intrusive on their property if bison are welcomed
- Can private landowners move bison off pastures where unwanted
- What would mgmt look like when they are welcome on private land
- The challenge of personal property rights balance among all interested parties
- How does one keep bison off of private property?
- Potential affect private property right from free wild bison
- Lack of private prop rights for those who don't run livestock to allow bison to be present on their private property
- I'm a landowner too doesn't matter size of property
- Private property rights. How will FWP keep bison off private land or compensation? Undue stress on ranch land & cattle, destruction of cropland.
- Bison need lots of land. To give them enough land, you'll infringe on private land.
- All boils down to landowners everything is on their backs
- Can't keep asking landowners to put up w/ all the wildlife
- RE: landowners impacted by wildlife
  - o Supreme court decision that landowners must live with wildlife.
- I understand supreme court decision that landowners are obligated to run the wildlife on the property they buy but not additional wildlife after the purchase
- Public Lands vs. Private Lands & how are you going to protect the rights of landowners.
- Will Bison management decisions set a precedent for future impacts to private property rights?
- Pay more attention to Public Property rights
- There is a danger to private property rights with proximity to wildlife. If a new federal park were created it would take away revenue from Glacier and YNP and vicinity.
- Like to know more about where Bison are likely to be moved & How that affects Private property
- Consider the private property rights of those that want Bison
- Keep in mind that private property is a cornerstone of the constitution and separates USA from the rest of world. If property rights are minimized, it will be a huge deal to the republic.

- FWP needs to address concerns of private landowners who provide habitat
- Accountability private landowners & livestock operators need to feel their needs are being met. I want ranchers to have needs met so they can get on board as well. Can designated lands around CMR meet these needs?
- Private property is huge big issue; we shouldn't be so willing to give up open space because when agric. is removed from the landscape.
- Private property rights should be protected to protect cattle & agriculture
- Pay attention more private property rights
- Private property rights are key.
- Important for state to acknowledge private property infrastructure will have to be larger and will be a cost to private property owners.
- Property damage concern in addition to property right
- Who is going to be responsible for damage to private property & potential health transmission to humans
- FWP does not currently care about damage to private property by wildlife. They will not care about damage done by bison population. Livestock populations are at risk from proximity of wildlife even if not grazed on public land only.
- Property damage. Is FWP responsible for property damage did to migrating bison? Fences, yards, etc.
- Financial impact on property owners
- Where do facts come from to address liability issues in private property
- State wildlife mgmt has been poor and the private landowner is footing the bill
- How will FWP mitigate 1000+ head of bison on interspersed private land
- What kind of a conflict resolution plan do we have when bison impact private land and who is responsible, state, Federal?
- Concern about bison & property damage (fences) & personal injury
- If damage occurs...disease, fences, there should be compensation long-term for their losses. Create a fund to pay these damage costs & help mitigate the losses.
- If wild bison get on private land who reimburse private landowner
- Reimburse counties for lost tax revenue? Related to livestock displacement
- Will the State reimburse landowners for personal property damage?
- The EIS should consider not reimbursing ranchers and farms for "natural" impacts of wildlife. Wildlife have a place in MT livestock not native, bison area.
- How will private landowner be compensated for Bison impacts
- Need to work on the livestock/wildlife interface
- Neg. grazing effects for livestock & other wildlife
- Additional pressure from large ungulates (bison) is additional competition for livestock
- Worried about hybridization/transmission of disease w/ comingling of cattle/bison
- If there is an injury to a neighbor from a bison that was hazed off a neighboring piece of property who is liable?
- What assurances will landowners have that FWP will manage bison with ranchers or farmers in mind.
- Competition between cattle and bison is real (use riparian areas)
- Bison could interbreed w/ cows, haven't so far done to diligence of ranchers could be interbreeding both wavs
- How are current private Bison herds impacted now & in the future by wild Bison
- Need to be away from domestic bison herds, more so than w/ cows
- This plan should address ecological functionality of bison, not just restoring an animal behind fences.
- Maintaining healthy grasslands is an important issue.
- Impacts of wallows / on streambeds/ how do protect streamside zones
- Concerned about the ecological status of bison
- Like to see FWP evaluate ecological benefits of bison specifically as native species in Montana
- Introduce Bison to benefit other wildlife species

- Are there habitat benefits on the grassland ecosystem when bison are on the landscape
- How many wolves are we gonna plant down there to manage them
- Consider the positive effects on Predator groups
- Consider rights of the native wild Bison over the invasive species
- Consider landscape changes that need to be considered with climate change. How Bison (wild) will impact the mass extinction of other animals do to the climate change. How will WLD Bison mitigate or bring back diversity.
- How will restoring wild Bison to the landscape influence Biodiversity
- It seems to me that information presented at this meeting is slanted. Riparian area usage is the same
- Will the bison be killed by wolves like the elk
- Wild. Bison are influenced by a preponderance of natural selection
  - o Cattle gone introgression
  - o In breeding
  - o Loss of genetic diversity
  - o Artificial selection
  - o All of these weaken or replace natural selection.
- Consider the pos. ecological affects of the Buffalo's size & ability to access forage that the other wildlife can benefit from in the winter.
- Impact of bison hazing on other wildlife
- Affects on other wildlife populations. Introducing Bison that may compete with elk/deer for food/habitat.
- Further investigate cohabitation of wildlife (Bison) and livestock. Wildlife (Elk & Deer) do fine with livestock, why not Bison. Henry Mtns in Utah as example
- How will the size of bison change the management of species like deer & elk? Change the FWP & public view of wildlife management.
- Impact on other wildlife & range lands. Competition for rangelands.
- Bison will displace other wildlife, have population level impacts on other wildlife and will impact habitat Riparian/Cottonwood habitats
  - Look at historical record for evidence (Lewis & Clark)
  - Look at the medicine lodge example in Idaho -- Forest Service permit in late 90s early 2000s
  - McKenzie Toulour
- Would like to see long-range plans for both bison & cattle. Divide state into ecological zones, minimize interactions. Present options, provide compensation to landowners. There are 2 markets in MT – beef & bison (tourism).
- Economic study done of cost of loss of brucellosis-free status.
- What would the economic impacts be to bison ranchers from competition with hunting licenses for free-ranging bison?
- Have the economic impacts investigated!
- What are the economic implications of livestock displaced by Bison
- Bison products could provide economic livelihood to tribes & other Montanans.
- Economic benefits to be accounted for, hunting, wildlife viewing, etc
- Tourism benefits need to be considered, bison sells MT as a destination.
- Need study of positive economic impacts of bison (hunting)
- Tourism is biggest industry in state how will aggressive mgmt of bison (slaughter etc) affect income → need benefit/cost analysis
- Agriculture is the #1 industry in MT
- How will tourist dollars fund wide open places, need to share benefit to traditional landowners (farmers, ranchers).

- Economic study on brucellosis stigma, MT is world leader in cow genetics. This has put a black eye on industry, especially in Paradise Valley. Perception is important, even if science is there.
- Economic benefits of bison populations in MT should be explored.
- I would like to see examination economic impact to state by taking grazing leases for livestock away to put wild bison on land.
- People would come to MT to see bison and will be spending money doing so
- Economic impact both regionally & state Tourism & hunting
  - o Economic impact on cattle industry would need to be addressed
  - Look at Jackson Hole for example
- Any economic analysis has to assess trade-offs, impacts as well as benefits. Marketing bison as a meat product.
- Costs to those already using range
- On public lands, economy of bison presence needs to be considered, opportunity for sales to hunt
- FWP Define how will they replace school trust DNRC funds lost due to Bison
- Would like to see in economic impact statement as well as an Environmental impact statement prepared before decisions are made so we know both the environmental & economic impacts before a decision is made – Long term
- Should be an economic impact statement as well as environmental impact statement should be done as a long-term decision – a generation ahead. Long term is in reference to the economics of MT.
- A real win for those areas economically to those areas that will receive brucellosis free bison as well.
- We should be examining long term economic impacts positively & negatively
- Compensation for damage by bison to fences, who will pay for it?
- Wild bison could be a tremendous economic force
- Bison would provide opportunities for filmmaking here in MT.
- EIS needs to analyze economic benefit of free-roaming bison to state economy
- Like to see bison out for amenities for commercial purposes opportunity to harvest bison just like deer, elk – for both wildlife viewing & hunting
- Revenue losses from bison competing w/ livestock on public lands, from state land being taken out of livestock grazing for bison. Revenue loss from livestock producers losing grazing permits on public land.
- Need to protect agriculture from the pressures being put upon it
- Programs like this are driving agriculture out of Montana
  - o People are quitting their public land allotments because of wolves, elk
  - o Disease concerns have forced people out of agriculture
  - o The state & federal purchase of private land for programs like this
- What I see here, people in favor of putting bison back wherever (reintroducing) your putting every thing back on landowners
  - o Hunting/ broken fences, diseases that could put them out of business
  - o Problem is then will cost livestock industry huge amount of expense
- Landowners are the ones who will have to deal with majority of problems
- The EIS should address program costs vs. benefits
- Concerned about how neighboring states would handle regulations on interstate shipping of livestock knowing that we have free-ranging bison some states might not accept our product
- Risk of not selling calves means I may have to sell out to a rich person bigger impact to you then.
- Could bison restitution help with economic diversity in central Montana
- Tourism will not bring in the economic money that agriculture does.
- Tourism dollars help entire community, need to be considered.
- Concerned about losing culture, economic and ecological benefits of bison on the landscape
- Don't believe there will be any positive economic impact for Montana thru bison reintroduction

- Cost of the program will far outweigh any benefit
- Can't see this being beneficial (free roaming bison)
- Tourism won't support small rural towns in MT. agric. will
- Need to address possible hazards to the public using public lands
- Cost to Benefit as it relates to Bison & society
- Consider positive Social impacts of not maintaining current heavy handed management happening annually
- How will Bison integrate with current population as opposed to many years ago? Can they truly be
- Challenging to conduct agricultural activities w/ the ranging bison
- Mgmt of tourism needs to account for and prevent destruction of area by tourism
- It would be a positive experience to allow people to view wild Bison throughout the state.
- Should address cultural value of bison not only as iconic species in West but also part of a state that prides itself on wildlife mgmt
- Show in the EIS that humans are a part of the environment and have been for a long time.
- Consider physiological & spiritual health benefit to Tribes.
- My concern is being able to enjoy the wildlife in this state that is native in their natural environment. It is unfair to disregard people's enjoyment of wildlife.
- People vs. Bison vs. People How are you going to balance those!
- What good would it do? Who does it help?
- It's a great opportunity for MT to continue to be a leader in the country in Wildlife Restoration, a strong MT tradition
- Like to see FWP look at impact of restoring bison in terms of conservation value for the species as a
- Lot of elk hunters who will have access to a lot less land
- Our wildlife pop. would be less than it is today if not for private property
- Will FWP manage carrying capacity of range?
- CFWCS grasslands are shrublands represent 40% of the Montana landscape those habitat types are a top priority for conservation – Met (illegible) need to conservation – provide wildlife corridors – how will FWP do that with bison – how will grazing be managed with bison (rest rotation) on these key habitats.
- MEPA analysis should make sure reintroduction is sustainable (grazing resources) on public lands. Just like cattle grazing.
- Public land Grazing Allotments around YNP where conflicts occur closed.
- Science should cover impact on range
- Who is going to determine the carrying capacity of the range
- Is FWP working with Federal agencies that manage public grazing ultimo. to determine what the fate of those allotments is!
- Is the issue brucellosis or grass
- Balance forage w/# of bison
- Impact of bison on AUM's
- Bison on public lands should not displace current cattle grazing allotments.
- FWP needs to look towards balance between free ranging cattle and wild bison on Public land.
- Federal lands belong to everyone
- What are the concerns over using public land sharing range
- Concerned about public land used for Bison not being available for grazing leases for Ranchers.
- Where is the free range land in MT that can inhabit bison? For production AG.
- Need to know how bison would impact livestock grazing leases on public land.
- Bison compete with cattle for forage talking on public lands only. May have to compromise some of the cattle use on public lands.

- If bison were a wildlife species they should have some area to roam without conflict or co-mingling with cows.
- There is enough federal & state land in state of MT where bison & cattle don't have to co-mingle. Specific bison reserves set up (tribal, blm) where we don't have the 2 species co-mingling on the same piece of land. –Cattle should not have free run of the whole state.
- If bison are introduced to public lands, should not interfere with other tourism benefits ex. recreation trail closures (motorized or non-motorized)
- Competition for rangeland.
- Since I own public land too, I would like to see native wildlife
- Some operators don't run on public land.
- In E.I.S. public process make sure publish & document loss grazing allotments do to allotments fees lost because Bison have displaced Cattle on Public Land
- Consider the pos. & neg. affects of grazing Bison on Public lands/grazing leases.
- Higher priority on public lands
- The ESA should not be used to move bison.
- Restoring bison in a few places could avoid ESA listing.
- Do other states have bison management plans and how do they work.
- Bison should be managed by the endangered species act, allowed to migrate into MT on their own
- Policy w/ respect to delisting, state needs to consider ESA prior to reintroducing bison, prevent future conflict. Need pre-meditated agreement w/ stakeholders.
- Want wild bison classified as wildlife & domestic bison as livestock
- Bison should be classified as Alternative Livestock when out of YNP
- Bison should be managed as wildlife free range somewhere on MT public lands w/ opportunity for hunting.
- Waiting for courts to decide if bison are wildlife.
- By making bison wildlife putting undo pressure on landowner
  - o If they put bison in they need to be classified as livestock not wildlife
- Rancher friend say if listed as wildlife they have to put up with damage
  - o They are responsible for financial end of it
- Any Bison herds re-established must be maintained as wild not livestock
- Classify Bison moved to other parts of the state as livestock & under D.O.L.
- Will WILD Bison actually "Be Wild" or will they become domesticated like some deer, elk . . .
- How does the classification of bison effect mgmt techniques, esp. w/ respect to disease (brucellosis) and other species that carry it
- Want to see bison not treated like cattle
- Would like to see a change of Bison designation from livestock to a wild species
- Bison should be managed as wildlife not as livestock. There are other species competing for grass & have disease, so why single out bison to be managed differently
- Want to see bison as wildlife species, managed as a sustainable based on genetics, not managed for a minimum herd size.
- Concern that FWP accepts & manages bison like deer/elk/antelope
- Like everyone to treat bison as wildlife
  - o NOT behind a fence
- Would like to see bison returned to wild animal designation and use relocation sites that had been identified if they work out.
- Bison Public trust, being looked @ as invasive when cattle are introduced. So why cattle getting preference? Understand Brucellosis, private rancher has burden to protect herds. Groups want bison don't want them as livestock. They are wildlife.
- Should be treated as a wildlife species in the state of Montana
- Want to see Bison managed as a wildlife species. Managed by wildlife agencies. Hunting should be a role in management

- FWP has a responsibility to manage wildlife in MT. I want wildlife in the state that will not negatively affect MT Industry. Would be shame to not allow wild bison in state do to public fears. Would hope FWP could adequately address public concerns.
- Bison are wildlife and should be managed by FWP as wildlife Dept of Ag should not be involved EIS should consider this.
- FWP should manage bison as a game species in or out of park. DOL should not have an influence.
- Clarify terms and define so everyone understands e.g., free-ranging, wild, etc. with regard to bison. Need better definitions for many of the terms disease free is another example.
- Free range doesn't exist any more how can MT have free-ranging bison.
- FWP should not be going thru this process if they are not the proper management agency for bison
- Have FWP manage bison
- How does FWP deal with existing laws? SB212 requires plan for containment.
- Are there populations of wild bison in MT that are classified as something other than "a species in need of management..?
  - o Or could there be under current law?
- Bison in quarantine should fall under Dept. of Livestock mgmt
- Wildlife should have to be managed under the same conditions as livestock
- How will plan address DOL zone management.
- Pull out of Interagency Bison Management Plan, move to allow existing Bison to inhabit existing habitat
- Rules to regulations for game farms need to reconsidered w/ both free ranging and domestic bison. Also need to be looked at for other wildlife.
- FWP does not have jurisdiction over bison and that should not change
- We need a plan to regulate bison populations instead of expanding or transplanting them
- Bison should by managed by FWP
- Would a fence keeping out wild Bison be considered or consistent w/the MT law requiring rancher to Fence to keep animals <u>OUT</u> not in.
- Who is accountable strategic plan?
- I think we have enough bison in MT. They won't go extinct. We have a problem with spreading disease to cattle & no way of knowing impact bison will have to private property.
- Where will the disease free bison come from
- Where do they plan to obtain bison that they intend to plant?
- This being a "learning opportunity" for the future programs could be a trap for constituents. Get large vision stated up front and have concurrence of the larger community.
- Need to set up a program so we learn as we go so we don't create unreal expectations
- Love to see FWP do inventory of large landowners who would be OK w/ bison on their property (or anywhere)
  - o Ex. Dome Mtn. Ranch would love to see bison
  - o Private property right that's being denied
- Recommend towns, cattle, & industry agency folks to visit & evaluate other states that have free ranging bison herd to learn from the other programs.
- More science needed on all sides
- Look to other examples of stakeholder groups where successful w/ bison (ex. in Prince Albert Nat'l Park) bison on private lands & park lands
- Like to see caveat let us set ourselves up to learn
  - o We all need to try & predict what could happen
  - o Cooperation from all sides
- Concerned about the basic research about the bison's ecological niche
- Will they study other managed bison populations to see what can be learned for Montana!?
- Need to learn all of the facts.

- What kind of Habitat improvements would be beneficial to bison population? I.e.) what would make area attractive to a Bison herd? Would like to see research on this.
- If FWP ends up doing a pilot project, details need to be spelled out early in process so public can comment.
- 2M = 3m (is supposed to equal) mitigate, monitor and measure a lot in document about monitoring and measuring but nothing about mitigating
- Huge learning curve for bison and Montana residents with regard to bison being on the landscape. We haven't had wild bison on the landscape for over 100 years.
- Frustrated by lack of current information using data from other locations where free-roaming bison exist.
- I came to support Wild Bison population in MT though FWP will have to be creative towards problem solving. We will have to be creative in learning to live with bison.
- Get facts out so a good conversation between all can result in education
- Public safety issue
  - o Those who are unfamiliar w/ living w/ bison more education prior to any relocation
- How will FWP communicate that there are scientific & culture reasons for expanding the bison to benefit everybody & not just the special interest groups?
- People experiencing wild bison would be good exposure and benefit Yellowstone bison (experience the animal as wildlife)
- Education if they are introduced people need to know how to interact with them.
- Property damage & personal injury is a concern better understanding of living w/ bison. Big education program is needed. So that we respect personal & property damage & try to avoid it.
- Tolerance issue tolerance differs between people, education is important but won't change tolerance levels.
- In any alternative integrate a educational component to teach the public how to live w/Bison
- Public education is important.
- Public awareness of pros and cons of Montana's existing private bison lands
- Like to see FWP do better job managing species we already have before adding another one
- FWP has proven they cannot manage elk populations. Landowners need assurance that they (FWP) will hold bison population at management objective
- Why should ranchers trust FWP to manage bison!
- <u>Accountability</u> = major concern No one available to address hard issues MFWP = will you be able to manage bison better than wolves or other species? And unintended consequences → facts that come out after an action Who will be accountable when problems?
- Who is gonna deal w/ problems if they get established 10-20 yrs from now
- Why does FWP believe they can manage a free ranging bison herd in state of MT? When the Dept. of Interior are unsuccessfully managing bison in a federal national park (2.2 million acres)
- Management of Bison would end up being as poor as mgmt of wolves is currently.
- Accountability long term accountability. Before bison are introduced there should be a guarantee that the managing agency is accountable for generations to come
- FWP needs to show public they are telling the truth. They need to say what they are going to do and then follow through.
- A lot of material from FWP contradicts itself. If you are the king an honest approach to this present information consistently.
- FWP should be required to consult and coordinate with County Commissions same as for large predators 87010217-(6)
- How will individual counties have a say as to if Bison are introduced in a county?
- What roll will local government & local people have in areas designated?
- What legal right to do this other than the state itself
- This has been successfully done in Canada, why couldn't it be done here?

- MT has the obligation to lead the nation in restoring wild Bison (there are no adequate wild herds south of Canada)
- Planning process needs mechanism to seek at opinion of moderate voices (not just squeaky wheels)
   → also relevant on ongoing basis
- Excited about this process
- This evening is a sorry process can't hear or read others comments
- Utilize the CWG recommendations for population, habitat, risk management
- Citizen working group is effective tool and should be continued
- Once the EIS is complete & a location is decided on will the EIS contain a provision for future expansion or will it be specific to one area?
- This scoping process has not worked well for providing specific comments.
- Skeptical about FWP process, not sure "who's" interests are being served by the process
- Commend FWP on the approach taking to EA difficult to balance all the interests.
- Consider what % is concerned about an action plan.
- Politically expedite alternatives will contribute nothing to bison we already have small herds on small parcels of land & poor habitat.
- Must have distinctive between bison blks & ranchers built into process?
- If free ranging bison are allowed, need to have a 5-10 yr time paid to review effectiveness w/ public process, should not be in perpetuity
- \*Environmental groups are taking extreme position of no livestock on public land. I do not support. Within livestock industry we have people saying that we have no room 4 bison another extreme position. I would like to see compromise.
- Get it done → changed in timely manner
- I would encourage FWP to employ folks certified in Range Management Spec. To evaluate the capacity of the habitat!
- Concerned about the legitimacy of the process, whether the best available science is being used.
- For review of EIS, possibly look at survey of large audience, may be done by entity other than FWP
- Who started this process of relocating wild bison to MT?
- Seek private-public partnerships. Emphasize "both" thinking instead of "either-or" thinking. There are working partnerships, models out there.
- Future hearings should be placed closer to potential release sites & areas where people are more likely to be affected.
- This proposal could create an unsolvable issue/problem for Dept.
- Would EIS address potential to translocate to states other than MT
- Why??
- The last environment assessment in Gardiner made conclusion without corresponding facts to back it up! Is this EIS going to do the same!
- Explain or justify why bison are they only wild or indigenous species we fence in. B/c I cannot think of another wild species We do that to
- Emphasize transparent, open dialog, working w/ communities, working w/ tribes.
- Would like to see citizens working group w/ landowners, livestock producers involved
  - o More input from them (livestock & ag interests)
  - o Cooperation between state agencies & livestock producers
  - o Ex. biologists & ranchers in UT everyone wants to work together for a positive outcome
- State needs to work with NGO's and hunters to mitigate conflicts, repair fences, etc.
- FWP says there is no plan for managing Bison but the Comprehensive F & W Conservation Strategy has a strategy for Bison!
- It seems the wild bison dream is a forgone conclusion but I don't see a lot of mention of our laws like SB 212 & laws we have to live with.
- Let us make the hard decisions.
- Allow public to lead & limit

- Landowners have final say
- Potential identified area (CMR) what is relationship between USFWS and NPS (IBMP)
- Need to evaluate this proposal with other applicable plans including: conflict with multiple use mandates, state HCP habitat conservation plan 2) BLM-RMP resource management plans 3) USFS forest plans 4) HMP or CCP USFWS plans Red Rock, CMR and other refuges 5) school trust \$ mandate. Multiple use aspects of management by BLM, FS and USFS.
- If wild Bison are not properly managed & cross state lines how will affect other states
- Aggressive engagement with federal agencies.
- Need relationship w/ watershed groups in areas where bison may be reintroduced.
- Concerns over treaty rights
- Cultural value for native tribes in MT
- Will plan address Indian hunting?
- Like the idea of working with Native Americans to reestablish Bison
- Not clear on Native American reintroduction & tribal herds.
- The tribes should have shared stewardship of bison management, not have it both ways.
- If people want to see free-ranging bison, they can go to YNP or states that have them.
- Is moving bison just a way to alleviate YNP's population?
- A comprehensive state plan must account for YNP's management. Should be state-driven.
- If YNP can't solve the problem of bison, why expand the problem.
- Vet said 400 or so bison was the right # for park and now 4,000
  - o Need a sustainable # and DOI needs to step up
- Free wild bison somewhere else in the state may have some negative consequences in Yellowstone bison (mentality that we have enough already) maybe would result in slaughter
- Pursue managing the Park Bison to level of success. Eliminate brucellosis
- Different strategy needing for hazing bison outside of YNP. Especially Horse Butte.
- Revisit impacts of YNP bison need to be revisited. What is pure strain genetics? Are Park bison actually pure?
- Population of free roaming bison in MT could negatively affect YNP bison.
- Is FWP being forced come up with a bison management plan because YNP doesn't want to take care
  of them
- Bring the YNP bison herd to 2000 that would fix everything
- To many bison in Park
- Will there be procedures to make sure Yellowstone Bison (in the Park) are managed properly
- MT has already moved bison so how could we say that we haven't?
- Lack of adaptive mgmt in Dept
- What is IBMP mandate as it relates to FWP management directives?
- Conflict between Bison and citizens of Gardiner needs to be resolved
- Hazing during calving season does not seem justified.
- Horse Butte- have to draw a line somewhere
- Outline the cost of what it cost tax payers to do this Program
- What would it take for FWP to truly manage Bison on landscape and is there the capacity given employees and money from FWP.
- Give solid estimate of what this would cost.
- Conservation groups would have to step up. FWP has not fully investigated the cost a wild bison population would have on Private Property owners. Who is going to pay landowners for their cost of maintaining their land due to bison population?
- How will FWP be properly funded for reintroduction
- Impact on DOL budget → which is largely funded by producers
- How much will EIS cost/ will there be any left for any actual bison mgmt
- Cost to govt? Who are we borrowing money from? Who has time to do it? Relocation costs etc.
- Where do we come up with the \$ for starting the program and running it thru time

- I would like to see FWP look at creative funding options, not only for the bison. Restoration program but also for setting up a way to work w/ local landowners
  - o Important to do from the beginning
  - o Have funding at the start of the process
- Re: Alt. funding it isn't going to raise a lot of \$ based on passed experience
- Concerned about rising costs associated with managing wild bison
- Who will pay costs of providing habitat for Bison
- Who is going to pay what has to be paid for? Taxpayers?
- Upgrade funding, would have to be upgraded if bison were widespread
- What is the cost to the taxpayer or Indians
- Does Congress have a stimulus plan for all this?
- Fiscal concerns → MFWP already in budget crunches, will they be able to take this on without hurting programs for deer, elk, antelope etc. It all comes down to habitat.
- How will it all be paid for? Shouldn't just be sportsmen buying tags. To satisfy law, need money for fences etc. Need creative way to pay for it.
- If FWP plans to implement bison. plan where will funding come from for an agency already strapped.
- Land swap with Turner and send bison to him
- Can they leave them where there at
- Think about & consider Bison rights
- I am tired of bloated government they should stay out of it.
- Can't enjoy bison on top of my cattle operation; I enjoy them in YNP
- Need to factor impact of wolves in elk movements; seeing more and more elk moving north into the Crazies.
- Whatever we do needs to be a step towards a solar budget and the elimination of high energy use of humans
- Would like to see state make money and become independent from Federal Gov.
- I believe that when MT FWP has to slaughter MT wildlife the meat should stay in MT.
- Turn over to wolves.
- How do Bison fit into the broad wildlife restoration legacy from a historical perspective

#### **Alternatives:**

- No Action
- I would like to have free- ranging bison in MT on public lands
- Buffalo on public land
- Buffalo on private land only where wanted
- No action, figure out how to manage YNP bison first
- Concentrate on locating bison to public land to minimize conflict.
- Would love to see more areas where wild bison flourish!
- Just don't like it, the whole thing is a bad idea not for bison being free range for no action.
- Test population to start with strictly controlled & start small
- No FWP involvement w/Bison management
- Establish one major demonstration area for reintroduction. Go as we learn.
- Restore the native Buff. To their native habitat
- Consider no action plan Leave in the Park
- Not in support of free range bison in state, should be classified as livestock. Already have free range bison in the state, north of Yellowstone NP.
- Support reintroduction of bison in MT. Only species not restored. Should be somewhere to reestablish them. Park bison aren't free roaming due to brucellosis issue, just as likely to have brucellosis as cows. Need factual based process. Decision should be based in science.

- Reintroduce into Montana favored.
- Location picked need to be far from Yellowstone to prevent disease transmission, maybe for Northern MT (CMR) for example
- Don't like it either, and don't think it should be done.
- Support reintroduction of free range herds on private lands. Great care needs to be taken re: impacts on private lands and livestock.
- Natural free ranging Bison allowed to exist outside of artificial boundaries
- Eliminate DSA, keep in YNP
- Spotted Dog should NOT be an alternative.
- In favor of bison on public land but not interspersed w/private lands, like Spotted Dog. If you're going to do it, do a big enough bunch to work genetically
- Leave as is and not introduce if people want to see bison they should go to Yellowstone
- Discrete area like the Henry's Mountains an area where management is feasible but Big enough area where you can have a real hunt at a large distance from Yellowstone to reduce disease risk. It should be management. Area with suitable climate & forage
- Certain designated areas at short-term & increase in size as we learn
- Lack of trust with FWP to consider any change no change.
- Would like to see bison where no conflicts w/ agricultural interests (e.g. CMR, Greater Yellowstone Basin, Custer NF, Ft Belknap, Upper Mo Breaks, Ft Peck)
- Support no action no guarantee of protection from brucellosis
- Pick an introduction site which is predominately public land, tribal land and willing private landowners
- If there is reintroduction then strictly controlled by area & size before it is decided for the entire state
- No reintroduction & tighten up management in the park
- For introduction of wild bison to expand genetic diversity & size of population in general. They are good for the grass & good for the land.
- Fully support bison on public land as long as necessary precautions are taken.
- Stay on public land and FWP has to show they can control wildlife
- No bison.
  - o We have free-ranging bison in YNP that are not managed.
  - o FWP needs to encourage YNP and APHIS to manage that herd
- See FWP only look at relocating disease (brucellosis) free bison & look at multiple place where those bison could come from not only quarantine, but UT, SD. etc
- Would like to see multiple opportunities. Proposed for where a hunted Population of wild Bison can be!
- Allow Bison to roam naturally like other wildlife
- Focus on YNP Bison, develop corridors outside Park to allow natural expansion
- Consider CMR as a location BUT be sure herd is large enough for genetic viability
- <u>NO ACTION</u> until Fed & State Agencies can prove they can manage bison w/o political nonsense & fear of back lash Bison need to be managed & controlled Fence line to fence line management is disrespectful to neighbors Yellowstone Para proven that politicizing of bison had made us more diverse about the issue.
  - ★ Prove using Yellowstone bison that agencies can control bison populations
- FWP should start small think big
- When we start this it will be very small population sizes
  - o Deal w/ problems as they come along
- Within all alternatives, should be education to MT citizens where people can learn what TRUE issues re: bison are.
- In favor of CMR as an alternative or anywhere we could have large #'s of wild free roaming bison.
  - o Bison are on American icon
  - o Should be separation of bison off private land

- O State plan important b/c if general American public want bison enough then Fed. govt will step in & take control which will be much more severe.
- CMR is ok location as long as MFWP can fiscally do it.
- Custer National Forest/Crow Reservation should be considered for reintroduction
- Would like to see conflict free zones
  - o ex. Horse Butte in Gallatin
- For bison introduction plan
  - o Where bison aren't present
  - o For ex. Gallatin/Gardiner/Yellowstone basins Natural expansion where feasible
- Start w/ no bison.
- Would like to see Big Wild Bison population in CMR and surround area.
- Identify public & private lands in MT where we can look at restoring bison herd without a fence –no fence.
- Look at starting with bison herd that's small than maximum amount land would support as one mechanism for keeping bison where they are
- Like to see WMA's considered for bison
  - o Certainly large private landowners above 10,000 acres & allow neighbors to shoot them if they come on prop
  - o Other low conflict areas to be reintroduced
- Start w/ WMA's whatever acreage possible